

Michael C. Ormsby  
United States Attorney  
Eastern District of Washington  
Stephanie Van Marter  
Assistant United States Attorney  
Post Office Box 1494  
Spokane, WA 99210-1494  
Telephone: (509) 353-2767

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA, )  
)  
Plaintiff, )

vs. )

4:15-CR-6049-EFS

JESE DAVID CARILLO CASILLAS (2), )  
ROSA ARACELI GRANADOS (3), )  
FRANCISCO DUARTE FIGUEROA (6), )  
GABRIELA MENDOZA VAZQUEZ (7), )  
BRITTNEY LEE ZARAGOZA (10), )  
SALVADOR GUDINO CHAVEZ (11), )  
JUVENAL LANDA SOLANO (14), )  
ERICA MARIA SOLIS (15), )  
EDGAR OMAR HERERRA FARIAS )  
(16), )  
JUAN BRAVO ZAMBRANO (19), )  
MIGUEL REYES GARCIA (21), )  
JOSE ADRIAN MENDOZA (23); and )  
VERONICA ELVIRA CORTEZ (24), )

Discovery Status Report

)  
Defendants. )

Plaintiff, United States of America, by and through Michael C. Ormsby,  
United States Attorney for the Eastern District of Washington, and Stephanie Van

1 Marter, Assistant United States Attorney for the Eastern District of Washington,  
2 hereby submits the following Discovery Status Report.

3 On February 2, 2017, the Court issued an Order directing all counsel to be  
4 prepared to discuss matters relative to the future handling of this case. *See*, ECF  
5 No. 341. The United States has spoken to the designated point person on behalf  
6 of the defense as to these same issues, however, thought it would be helpful to  
7 provide this status to the Court and counsel prior to the Pre-Trial conference on  
8 February 21, 2017.

9 As the United States notified the Court and counsel at the earlier pre-trial  
10 conference, there would be a superseding indictment with a number of new  
11 Defendants, many of which have not yet appeared before the Court for a Pre-  
12 Trial conference. The United States anticipated and continues to submit this case  
13 would properly qualify as a complex case given the number of the Defendants,  
14 the nature of the charges, the multiple jurisdictions involved and the volume of  
15 discovery.

16 As to the status and volume of discovery, the United States has provided  
17 and will continue to provide discovery. Discovery is now provided through a  
18 web based cloud entitled USAfx. Each attorney is given access to the web based  
19 cloud via a password. However, in this case, discovery has also been provided  
20 on hard drives due to the volume of the data to be downloaded. For instance, the  
21 Royal Canadian Mounted Police (RCMP) have been a part of this investigation.  
22 They provided their reports to the United States, very well organized and on a  
23 hard drive. There has also been a great volume of pole camera data. Since both  
24 of those items had a large amount of data, counsel was invited to mail in their  
25 own hard drives so the information could simply be copied over rather than  
26  
27

1 uploaded into the web based cloud<sup>1</sup>. To date, a large volume of discovery has  
2 been provided and includes the following types of data:

- 3 1) Pre-Indictment pleadings
- 4 2) Investigative reports in .pdf format
- 5 3) Photographs
- 6 4) Pole Camera video
- 7 5) GPS Tracker Data
- 8 6) Telephone Toll Data
- 9 7) Administrative Subpoenas
- 10 8) Recordings both audio and video
- 11 9) Bank Records

12 Although the bulk of the discovery has been provided as of this date, there  
13 are a few additional pieces that are waiting to be provided. This includes  
14 recordings and videos of the undercover communications between certain  
15 Defendants and the Under Cover Agent(s) and phone downloads from seized cell  
16 phones. This data because it contains .jpeg images, .mp4 videos and excel type  
17 reports from the Celebrite phone download program, is voluminous in size.  
18 Before the United States contacted counsel to determine how best to provide this  
19 data, the United States thought it better to see first if a discovery coordinator was  
20 going to be appointed. The United States can address this more fully with the  
21 Court and counsel at the PTC; the point being there is more discovery to come.

22 The United States also anticipates additional discovery pertaining to the  
23 ongoing nature of the investigation which may include additional interview  
24  
25

---

26  
27 <sup>1</sup> If this data were to be uploaded into the cloud, it would take a significant  
28 amount of time to upload and then download, this process seemed more efficient.

1 reports, free talk reports and expert reports<sup>2</sup>. The United States will be prepared  
2 to answer any additional questions at the Pre-Trial conference.

3  
4 DATED this 16th day of February 2017.

5 Michael C. Ormsby  
6 United States Attorney

7 *s/Stephanie Van Marter*

8 Stephanie Van Marter  
9 Assistant United States Attorney

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26 <sup>2</sup> The United States has provided all expert reports received which has included a  
27 number of lab reports. The United States is awaiting information as to any  
28 outstanding expert related reports and will provide those as soon as received.

CERTIFICATION

I hereby certify that on February 16, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following, and/or I hereby certify that I have mailed by United States Postal Service the document to the following non--CM/ECF participant(s):

Robin Emmans, [robin\\_emmans@secondstreetlaw.com](mailto:robin_emmans@secondstreetlaw.com)  
Jim Egan, [jim.egan@owt.com](mailto:jim.egan@owt.com)  
Adam Pechtel, [adam@pechtellaw.com](mailto:adam@pechtellaw.com)  
Rick Hoffman, [rick\\_hoffman@fd.org](mailto:rick_hoffman@fd.org)  
Ricardo Hernandez, [hlooffice@basinis.com](mailto:hlooffice@basinis.com)  
Victor H. Lara, [vh\\_lara@hotmail.com](mailto:vh_lara@hotmail.com)  
Gregory Lee Scott, [gregory@scottlaw.net](mailto:gregory@scottlaw.net)  
John Gregory Lockwood, [jgregorylockwood@hotmail.com](mailto:jgregorylockwood@hotmail.com)  
Troy Joseph Lee, [troylee@qwest.office.net](mailto:troylee@qwest.office.net)  
Samuel Swanberg, [2lawyers@owt.com](mailto:2lawyers@owt.com)  
Richard A. Smith, [rasmith@house314.com](mailto:rasmith@house314.com)  
Kenneth D. Therrien, [kentherrien@msn.com](mailto:kentherrien@msn.com)  
Scott W. Johnson, [scott@johnsonorr.com](mailto:scott@johnsonorr.com)  
Lee Edmond, [ledmond.esq@gmail.com](mailto:ledmond.esq@gmail.com)

*s/Stephanie J. Van Marter*

Stephanie Van Marter  
Assistant United States Attorney